



*Brockton, Massachusetts*  
*"City of Champions"*  
*Linda M. Balzotti – Mayor*

TESTIMONY OF  
MAYOR LINDA M. BALZOTTI, CITY OF BROCKTON  
ON  
THE TENTATIVE DECISION OF THE  
ENERGY FACILITIES SITING BOARD  
ON  
BROCKTON POWER COMPANY LLC'S  
PROJECT CHANGE FILING  
September 22, 2011

Good morning. My name is Linda Balzotti, and I am the proud Mayor of the City of Brockton. I want to thank the Energy Facilities Siting Board ("Siting Board") for this opportunity to address the entire board and comment on the Tentative Decision which addresses certain proposed changes to Brockton Power Company's planned power plant to be located in the great city of Brockton.

I also would like to thank the Siting Board and its staff for conducting the many hearings it held and for allowing additional discovery on these proposed project changes and for the opportunity to express publicly my vehement opposition to the construction of this project in my city – the City of Champions.

Even after the additional vetting the project received in your hearing, I still feel and continue to believe that the proposed power plant will have untold and unacceptable adverse impacts on the residents of my proud and beautiful city and the thousands of other good people who live and work in the region. Despite the proposed changes, this project is the wrong project for our community.

For several reasons, the EFSB should not approve any of the proposed changes for this project.

First, I wish to remind you that a significant portion of Brockton's population meet the criteria for what is called an "Environmental Justice Population" because of income, ethnicity, or lacking in English-language proficiency. These city residents are entitled to "Environmental Justice."

The Commonwealth's Environmental Justice Policy is designed to protect Environmental Justice Populations from shouldering a disproportionate share of environmental pollution. In proposing to approve Brockton Power's plant, the Siting Board seems to have forgotten or ignored the Environmental Justice Policy.

Brockton residents are being unfairly burdened by a disproportionate portion of the pollution of this plant.

All types of pollution cross boundaries. Air pollution perhaps is the best example. It goes where the wind takes it. It just doesn't respect artificial lines of property ownership or municipal limits or neighborhood boundaries. The air pollution from the Brockton Power plant will leave the property and cross into the Environmental Justice Population areas within the City of Brockton. It will also go beyond Brockton into neighboring towns.

It makes no sense for the Siting Board to disregard the state's Environmental Justice Policy just because the proposed power plant is not inside a designated Environmental Justice Population area, but merely near one. The closest Environmental Justice Population is within 1,000 feet, to be exact.

The City has recently completed expensive and extensive improvements to its Advanced Wastewater Treatment Facility so as to reduce air pollution. The City did not do this to accommodate Brockton

Power and let Brockton Power negate the benefit of those improvements to the AWRP.

Second, the exact amounts of air pollution still have not been accurately or fully described.

The City's air expert, Certified Meteorologist Paul Eisen of Roux Associates, checked the figures Brockton Power submitted to support their claim about the amount of Carbon Monoxide ("C.O.") the plant would emit. He discovered they were off by a significant amount, almost 40 percent. He estimates the true carbon monoxide emissions will be about 138 tons per year, whereas Brockton Power says it will be 98.5 tons per year using arbitrary and unrealistic scenarios of "startup" and "shutdown."

Also, Mr. Eisen has found that Brockton Power has not fully accounted for the plant's fine particulate matter or "P.M. 2.5" emissions. These tiny, invisible particles are hazardous to our residents' health, and are so small that they can get deep into the lungs, causing serious health problems. Mr. Eisen thinks Brockton Power failed to take into account all sources of PM2.5 when it performed its calculations for PM2.5, so

underestimating its impact. No additional PM2.5 is acceptable to the City and should not be accepted by the Siting Board.

Further, Mr. Eisen shows that Brockton Power continues to misrepresent this project's impacts to air quality by using data from Logan airport rather than from Taunton or the project site. Mr. Eisen proves what we know from common sense: wind speeds are lower away from the coast. This means pollutants from the plant's stack will not travel as far away as Brockton Power would like us to think.

Brockton residents are being unfairly burdened by a disproportionate portion of the pollution of this plant. The plant will provide power for the entire state and maybe even New England, but at the detriment of the City of Brockton's residents and environment.

Third, the proposed design changes do not comply with zoning. Brockton Power now proposes 116-foot high walls around the Heat Recovery Steam Generator ("HRSG"; *prn*: "her-sig") instead of a 130-foot tall building surrounding it, as has been previously approved by the Siting Board. The City disagreed with that decision and appealed it to the Supreme Judicial Court, where it is still pending review. Yet these

revised walls still mean the project does not comply with zoning requirements, as the walls cannot be, at most, more than 60 feet high in the I-3 zoning district.

The latest variation of this project does not comply with city zoning requirements, and most importantly, Brockton Power has not completely revealed the full extent of air quality impacts on the City of Brockton and surrounding environment. The air pollution from the plant would blow into three already hard-hit Environmental Justice Populations, and the rest of the hard-working citizens of Brockton and the thousands of other good people of the region.

In conclusion, for all these reasons, the Siting Board should reject the Project Change Filing in its entirety. In doing so, you will be preserving the right of my community to choose its own destiny.

Thank you.